

# Spencer Telecom LLC

February 24, 2011

**Via Electronic Filing**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

**Re: Spencer Telecom LLC - CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Spencer Telecom LLC, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2010 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned at (817) 385-1005.

Very truly yours,



Enclosure

cc: Best Copy and Printing, Inc. (via E-Mail)

**2 Manchester Ct., Mansfield, TX 76063  
Ph: (817) 385-1005 FAX: (214) 594-7833**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 24, 2011

Name of company covered by this certification: Spencer Telecom LLC

Form 499 Filer ID: 827982

Name of Signatory: Michael S. Young

Title of Signatory: President


I, Michael S. Young, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining the company's compliance with the requirements set forth in section 64.2001 *et seq.* of the commission's rules.

The company has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

## **Statement of Spencer Telecom LLC Processes Protecting CPNI**

### ***Background***

Spencer Telecom LLC (hereinafter referred to as "Spencer Telecom") is an enhanced service provider offering a variety of Internet-based services including Interconnected VoIP service. The company provides services exclusively to business and wholesale customers, and the company maintains both a physical and electronic address of record for each customer.

Spencer Telecom operates a web portal that allows customers access to account information, including CPNI. This web portal uses industry-standard authentication methods and schemes to protect customer data.

### ***Policies and Procedures for Ensuring Protection of CPNI***

New customers subscribing to Spencer Telecom services have a dedicated sales representative. Customers are assigned a username and password that are randomly generated and not based on any identifiable biographical or account information. Customers who lose their username or password are able to initiate having a new password sent to the e-mail address of record.

Spencer Telecom may, as permitted by the CPNI rules, use CPNI without customer approval to bill and collect for services rendered and to protect the rights or property of the Company, other users or other carriers from unlawful use.

Spencer Telecom does not provide CPNI without proper customer authentication and does not provide call detail records over the phone. In order to authenticate a customer's identity prior to disclosing CPNI, Spencer Telecom authenticates the customer by calling the customer back at the telephone number of record. Call detail records are provided via e-mail or U.S. mail to the customer's address of record.

Spencer Telecom does not use CPNI information to market services to its customer base. As such, Spencer Telecom does not engage in any marketing activities that would require consent from its customer base. From the time the CPNI rules became applicable to the Company, there have been no marketing campaigns targeting existing customers.

No joint ventures have been undertaken or subcontractors used by Spencer Telecom or are contemplated for the near future. Spencer Telecom does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services.

All employees have had training sessions on CPNI rules, and have been notified of the penalties associated with violations of CPNI regulations – up to and including termination of employment. All employees have been notified of the need to inform their supervisor if a customer alleges a CPNI breach has occurred.

All data access on Spencer Telecom internal systems is logged and an audit trail is available to identify breaches in CPNI access. All e-mail from customers is archived and saved indefinitely for audit purposes. Employees are only granted access to data commensurate with their support responsibilities.

Access to data stored in the company's databases is protected by firewalls. Access to this data from outside the company's physical network is only permitted through encrypted tunnels. The company's website uses SSL certificates and encryption to prevent hackers from obtaining data over the Internet.

Physical access to the company's databases is protected by typical data center security measures, including positive identification, video surveillance electronic pass keys and physical locks.

Spencer Telecom has procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Spencer Telecom will notify affected customers. Spencer Telecom will maintain a record of any CPNI-related breaches for a period of at least two years.

### ***Conclusion***

Spencer Telecom recognizes the need to protect the private information it stores related to its customers. The company believes it adheres to the FCC's guidelines on these matters.